#### E UNITED STATES PATENT AND TRADEMARK OFFICE HE BOARD OF PATENT APPEALS AND INTERFERENCES

Appellants:

Hanson et al.

Filing Date:

10/11/2001

For:

ACCESSORY MODULE FOR

HANDHELD DEVICES

Group Art Unit: 2673

Docket No.:

035451-0146

Application No.: 09/975,544

Examiner:

David Lee Lewis

CERTIFICATE OF EXPRESS MAILING I hereby certify that this correspondence is being deposited with the United States Postal Service's "Express Mail Post Office To Addressee" service under 37 C.F.R. § 1.10 on the date indicated below and is addressed to: Commissioner for Patents, PO Box 1450, Alexandria, Virginia 22313-1450. EV 505796942 US September 17, 2004 (Express Mail Label Number) (Date of Deposit) Deborah A. Kocorowski (Printed Name)

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**BRIEF ON APPEAL** 

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This paper is being filed in response to the final Office Action dated December 17, 2003 (finally rejecting Claims 1-40). The Notice of Appeal was filed on May 17, 2004 and received by the U.S. Patent and Trademark Office on ay 20, 2004. Appellants respectfully request reconsideration of the application.

Under the provisions of 37 C.F.R. § 1.192, this Appeal Brief is being filed together with a check in the amount of \$750.00 covering the Rule 17(c) appeal fee and a 2-month extension fee (\$330 + \$420). If this fee is deemed to be insufficient, authorization is hereby given to charge any deficiency (or credit any balance) to the undersigned deposit account 06-1447.

#### REAL PARTY IN INTEREST

This application has been assigned of record to Palm, Inc. having a place of business at 5470 Great America Parkway, Santa Clara, California 95052. The assignment was recorded in the records of the United States Patent and Trademark Office at Reel/Frame 012256/0701 on October 11, 2001.

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#### RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

#### STATUS OF CLAIMS

This is an appeal from the final Office Action dated December 17, 2003, finally rejecting Claims 1-40. Claims 1-40 stand rejected. Claims 1-40 are therefore on appeal.

#### **STATUS OF AMENDMENTS**

No claims have been amended subsequent to the mailing date of the final Office Action dated December 17, 2003.

#### SUMMARY OF INVENTION

The present invention relates generally to a display module for a handheld computer (See Specification, page 8, paragraph [0030] – page 9, paragraph [0032]). The display module includes a display housing and a display incorporated into the display housing (See Specification, page 10, paragraph [0034] – page 11, paragraph [0036]). The display module also includes an interface housing (Id.). Further, the display module includes an interface configured to be removably coupled to the handheld computer (Id.). The interface is incorporated into the interface housing (See Specification, page 12, paragraph [0038]). Further still, the display module includes a memory (See Specification, page 10, paragraph [0035] – page 11, paragraph [0036]).

Another exemplary embodiment of the invention relates to an accessory module for a portable electronic device (See Specification, page 8, paragraph [0030] – page 9, paragraph [0032]). The accessory module includes an accessory housing (See Specification, page 10, paragraph [0034] – page 11, paragraph [0036]). The accessory module also includes an interface for making electrical connection between the accessory module and a host device, and an interface housing for supporting the interface (Id.). The interface housing is hinged to the accessory housing such that the interface housing can fold behind the accessory housing, and the interface housing can unfold to extend for insertion into an interface slot in a handheld computer (See Specification, page 10, paragraph [0035] – page 11, paragraph [0036]).

Yet another exemplary embodiment of the invention relates to a portable display module for coupling to a host device (See Specification, page 8, paragraph [0030] – page 9, paragraph [0032]). The portable display module includes a display housing and a display coupled to the display housing (See Specification, page 10, paragraph [0034] – page 11, paragraph [0036]). The portable display module also includes an interface housing and an interface configured to be removably coupled to the host device (Id.). The interface is incorporated into the interface housing. Further, the portable display module includes a memory (See Specification, page 10, paragraph [0035] – page 11, paragraph [0036]).

In accordance with a particular exemplary embodiment of the invention, the display of the display module is smaller than the display of a handheld computer so that it may obtain data from the handheld computer and interact with the handheld computer and also be moved and be used in smaller device (See Specification, page 11, paragraph [0036] – page 14, paragraph [0040] and FIGs. 1, 4A, 4B, and 5).

#### **GROUNDS OF REJECTION REQUIRING REVIEW**

Two grounds of rejection were imposed by the Examiner, and are concisely described in the following numbered paragraphs:

- 1. Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 are rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,189,056 to Ogura et al.
- 2. Claims 1, 10, 11, 16, 23, 32, 33, and 38 are rejected under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2003/0016327 to Kotchick et al. in view of Ogura et al.

#### **ARGUMENT**

#### I. Legal Standards

#### A. Standards Under 35 U.S.C. § 102(a).

Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 have been rejected under 35 U.S.C. § 102(a), which states:

A person shall be entitled to a patent unless (a) the invention was known or used by others in this country, or patented or described in a printed publication in this or a foreign country, before the invention thereof by the applicant for patent.

Under Section 102, a claim is anticipated, i.e., rendered not novel, when a prior art reference discloses every limitation of the claim. <u>In re Schreiber</u>, 128 F.3rd 1473, 1477 (Fed. Cir. 1997). Although a prior art device "may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so." <u>In re Mills</u>, 916 F.2d 680, 682 (Fed. Cir. 1990). "Rejections under 35 U.S.C. § 102 are proper only when the claimed subject matter is identically disclosed or described in the prior art." <u>In re Arkley, Eardley, and Long</u>, 172 U.S.P.Q. 524, 526 (CCPA 1972).

Claim terms will be given their ordinary and accustomed meaning, unless there is "an express intent to impart a novel meaning to [the] claim [term]" by the patentee. York Prods., Inc. v. Cent. Tractor Farm & Family Ctr., 99 F.3d 1568, 1572 (Fed. Cir. 1996); Sage Prods. v. Devon Indus., Inc., 126 F.3d 1420, 1423 (Fed. Cir. 1997). The ordinary and accustomed meaning of a claim term is determined by reference to dictionaries, encyclopedias, and treatises available at the time of the patent. See Texas Digital Systems, Inc., 308 F.3d at 1203. Such references are always available for claim construction purposes and are neither extrinsic nor intrinsic evidence. See Texas Digital Systems, Inc. v. Telegenix, Inc., 308 F.3d 1193, 1202-03 (Fed. Cir. 2002).

In order to impart a specific meaning to a claim term, i.e., for the inventor to be her own lexicographer, such lexicography must appear "with reasonable clarity, deliberateness, and precision." In re Paulsen, 30 F.3d 1475, 1480 (Fed. Cir. 1994). However, intrinsic evidence may be consulted to determine the definite meaning of a claim term that is unclear. CCS Fitness, Inc. v. Brunswick Corp., 288 F.3d 1359, 1367 (Fed. Cir. 2002). A claim term may be redefined without any express statement of redefinition in the specification. Bell Atl. Network Servs., Inc. v. Covad Communications Group, Inc., 262 F.3d 1258, 1268 (Fed. Cir. 2001). "[A] claim term will not carry its ordinary meaning if the intrinsic evidence shows that the patentee distinguished that term from prior art on the basis of a particular embodiment" or "described a particular embodiment as important to the invention."

#### B. Standards Under 35 U.S.C. § 103(a).

Claims 1, 10, 11, 16, 23, 32, 33, and 38 have been rejected under 35 U.S.C. § 103(a), which states:

A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negatived by the manner in which the invention was made.

The legal standards under 35 U.S.C. § 103(a) are well-settled. Obviousness under 35 U.S.C. § 103(a) involves four factual inquiries: 1) the scope and content of the prior art; 2) the differences between the claims and the prior art; 3) the level of ordinary skill in the pertinent art; and 4) secondary considerations, if any, of nonobviousness. See Graham v. John Deere Co., 383 U.S. 1, 148 U.S.P.Q. 459 (1966).

In proceedings before the Patent and Trademark Office, the Examiner bears the burden of establishing a prima facie case of obviousness based upon the prior art. In re Piasecki, 745 F.2d 1468, 1471-72, 223 U.S.P.Q. 785, 787-88 (Fed. Cir. 1984). "'[The Examiner] can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references." In re Fritch, 972 F.2d 1260, 1265, 23 U.S.P.Q.2d 1780, 1783 (Fed. Cir. 1992).

As noted by the Federal Circuit, the "factual inquiry whether to combine references must be thorough and searching." McGinley v. Franklin Sports, Inc., 262 F.3d 1339, 60 USPQ.2d 1001 (Fed. Cir. 2001). Further, it "must be based on objective evidence of record." In re Lee, 277 F.3d 1338, 61 USPQ.2d 1430 (Fed. Cir. 2002). The teaching or suggestion to make the claimed combination must be found in the prior art, and not in the applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ.2d 1438 (Fed. Cir. 1991). The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. In re Mills, 916 F.2d 680, 16 USPQ.2d 1430 (Fed. Cir. 1990). "It is improper, in determining whether a person of ordinary skill would have been led to this combination of references, simply to

'[use] that which the inventor taught against its teacher.'" <u>Lee</u> (citing <u>W.L. Gore v. Garlock</u>, <u>Inc.</u>, 721 F.2d 1540, 1553, 220 USPQ 303, 312-13 (Fed. Cir. 1983)).

### II. <u>Rejection Of Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 Under 35 U.S.C.</u> § 102(a) Over Ogura et al.

In the final Office Action dated December 17, 2003, Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 were rejected under 35 U.S.C. § 102(a) as being unpatentable over U.S. Patent No. 6,189,056 to Ogura et al.

For the reasons given below, the Appellants submit that the rejection of Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 is improper and should be reversed.

## A. Examiner's Rejection of Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 Should be Reversed Because Ogura et al. Does Not Disclose or Teach At Least One Element Of Each of the Rejected Claims.

"The claimed invention is not anticipated under Section 102 unless each and every element of the claimed invention is found in the prior art." Hybritech, Inc. v. Monoclonal Antibiodies, Inc., 231 U.S.P.Q. 81, 90 (Fed. Cir 1986). Accordingly, the rejection of these claims under 35 U.S.C. § 102(a) is improper and should be reversed.

#### 1. Claims 1-9, 12-15, and 17-18.

The Examiner indicated that with regard to Independent Claim 1, the claim limitation recited in Independent Claim 1 of "the display is smaller than a display of the handheld computer does not differentiate the claim combination from the disclosure of Ogura et al."

Appellants disagree with the Examiner because the recitation of the terminology "a handheld computer should be construed more narrowly than construed by the Examiner." Terms of the claim should be given their ordinary and accustomed meaning determined by reference to dictionaries, encyclopedias, and treatises available at the time of the patent. As provided by appellants, in their response to the final Office Action, dictionaries, and other similar references define "handheld computer" as a computer small enough to be carried in your pocket. The Examiner has construed a laptop computer, which is disclosed in the Ogura et al. reference as a handheld computer. Appellants filed, in a supplemental IDS (attached as Evidence Appendix) and as an exhibit to the final Office Action, a printout from the website Dictionary.com which indicated that a "handheld computer" is "a computer small enough to

be carried in your pocket." A laptop computer is not one which can conventionally be carried in your pocket.

Appellants also submitted in the supplemental IDS (See Evidence Appendix) accompanying the filing of the reply to the final Office Action an exhibit attached to the Reply to the final Office Action, an alternative definition of the term "handheld" as it refers to computers. The reference is a printout from the website searchmobilecomputing.com. The website describes a handheld computer as "a computer that can conveniently be stored in a pocket (of sufficient size) and used while you are holding it." Thus, it is clear that the plain meaning of "handheld computer" should not be construed to include notebook computers, as the examiner has suggested.

Further still, it should be appreciated that the applicant may be his or own lexicographer as long as the lexicography must appear "with reasonable clarity, deliberateness, and precision, and as long as the meaning assigned to the term is not repugnant to the term's well known usage." Appellants refer the Examiner to the specification at page 1, paragraph [0002], which states "handheld computing devices, palmtops, personal digital assistants (PDAs) or handheld computers typically weigh less than a pound and fit in a pocket." Accordingly, it is clear that the Appellants defined the term "handheld computer" within specified constraints which would not include notebook computers. Notebook computers conventionally do not weigh less than a pound and conventionally do not fit in a pocket.

Accordingly, it can be seen that the Appellant's limitation that "the display is smaller than a display of the handheld computer," is not disclosed, taught, or suggested by Ogura et al. Appellants have shown that this is a very important limitation in the application, as the electronic module can be used in a variety of very small devices such as, but not limited to, a mobile phone (FIG. 5) or a watch (FIG. 4). If the display of the module was much larger, it could not be conveniently be used in a mobile phone or in a watch.

Accordingly, for all of the reasons provided above, Appellants respectfully submit that Independent Claim 1, and its respective dependent claims are not anticipated by Ogura et al. Reversal of the rejection of Independent Claim 1 and its associated dependent claims is therefore respectfully requested.

#### 2. Claims 19 and 22.

Appellants respectfully submit that with regard to Independent Claim 19, what is claimed is "an accessory module for a handheld electronic device." The accessory module includes an interface housing that can unfold to extend for insertion into an interface slot in "the handheld electronic device" and further, that the "interface can be used to couple to a host device when in the folded position."

Appellants respectfully submit that first, <u>Ogura et al.</u> does not disclose, teach, or suggest a handheld electronic device and further a handheld electronic device having a slot into which the interface housing can extend into. Appellants refer to the discussion of the definition of the words "handheld" with regards to Independent Claim 1. Again, <u>Ogura et al.</u> does not disclose a "handheld" electronic device which receives the accessory module, in light of the reasonable construction of the word "handheld" as referred to with regard to Claim 1, <u>Ogura et al.</u> Second, <u>Ogura et al.</u> does not disclose, teach, or suggest another device (the host device) into which the accessory module may be received in the folded position. Applicants have shown that their device can get information from a handheld computer, be folded, and snapped into a watchband (or other small device), for example.

Accordingly, <u>Ogura et al.</u> does not disclose, teach, or suggest an accessory module for a handheld electronic device that meets all of the claim limitations of Claim 19. Reversal of the rejection of Independent Claim 19 and its associated dependent claims is therefore respectfully requested.

#### 3. Claims 23-31, 34-37, 39, and 40.

Independent Claim 23 is directed to "a portable electronic module for coupling to a host handheld device." The portable electronic module includes "an interface configured to be removably coupled to the host handheld device." Accordingly, for the reasons given above, Ogura et al. does not disclose a portable electronic module that couples to a host handheld device. Using the ordinary meaning of "handheld device" (as discussed above), Ogura et al. discloses only a handheld device that can be interfaced with a notebook, desktop, or tower computer. Ogura et al. does not disclose, teach, or suggest the use of a portable display module that couples to a host handheld device.

Thus, Independent Claim 23 and its respective dependent claims are not anticipated by <u>Ogura et al.</u> and therefore reversal of the rejection of Claim 23 and its associated dependent claims is therefore respectfully requested.

## III. REJECTION OF CLAIMS 1, 10, 11, 16, 23, 32, 33 And 38 UNDER 35 U.S.C. § 103(a) Over U.S. Published Patent Application Number 2003/0016327 to Kotchick et al. in view of Ogura et al.

In the final Office Action dated December 17, 2003, claims 1, 10, 11, 16, 23, 32, 33, and 38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. published Patent Application No. 2003/0016327 to Kotchick et al. in view of Ogura et al.

For the reasons given below, the Appellants submit that the rejection of claims 1, 10, 11, 16, 23, 32, 33, and 38 is improper and should be reversed.

## A. The Examiner's Rejection of Claims 1, 10, 11, 16, 23, 32, 33, and 38 Should Be Reversed Because There Is No Suggestion To Combine The Teachings of Kotchick et al. and Ogura et al.

To establish a prima facie case of obviousness based on a combination of prior art references under 35 U.S.C. § 103(a), the Examiner must first show that there is a suggestion or motivation to combine the teachings of those references. This may come in the form of some objective teaching in the prior art or, alternatively, knowledge generally available to one of ordinary skill in the art at the time of the invention that would lead that individual to combine the relevant teachings of the references.

When the motivation to combine the teachings of references is not immediately apparent, it is the duty of the Examiner to explain why the combination of the teachings is proper. Ex parte Skinner, 2 U.S.P.Q.2d 1788 (Bd. Pat. App. and Int. 1986). In this case, the Examiner has not satisfied the burden of establishing that one of ordinary skill in the art would have been motivated to combine the teachings of Kotchick et al. and Ogura et al.

What is taught in <u>Kotchick et al.</u> are user replaceable display modules for electronic devices, that is display modules that can be separated from the electronic device and replaced, in the situation that they are damaged. What is taught in <u>Ogura et al.</u> is an electronic device that may be coupled to a notebook computer via a card connector. The electronic device may have the display, processor, power, and memory. There is no motivation or suggestion to

combine the teachings of <u>Kotchick et al.</u> and <u>Ogura et al.</u> to arrive at applicants' invention which provides for a stand alone electronic module wherein the electronic module interfaces with a handheld computer and has a display that is smaller than the display of the handheld computer, among other limitations.

If one combines the teachings of a replaceable display module with the teachings of Ogura et al., what may be taught is an electronic device, such as a handheld computing device (FIG. 7 of Ogura et al.), having a card connector and that is couplable to a laptop computer and could have a replaceable display as taught in Kotchick et al. This is a far cry from the invention of Claim 1, e.g.

Accordingly, there is no suggestion or motivation to combine the teachings of Kotchick et al. and Ogura et al. to arrive at Applicants' invention. The Examiner appears to have selected elements, from otherwise unrelated references, to make a combination that is unsupported by the actual teachings of such references. Further, the Examiner has not provided any indication as to the motivation for making the combination which would provide some of the advantages which applicants discuss in their specification. Instead of indicating how the various features of Kotchick et al. are relied upon by the Examiner could be incorporated into the structure disclosed in Ogura et al., the Examiner has simply selected certain elements in order to make an asserted combination. Such statements, however, do not evince the "thorough and searching inquiry" required by the U.S. Court of Appeals for the Federal Circuit. McGinley v. Franklin Sports, Inc., 262 F.3rd 1339, 60, U.S.P.Q.2d 1001 (Fed. Cir. 2001). Instead, it appears that the combination of references relied upon by the Examiner is based on improper hindsight reasoning, using the Appellants' own disclosure as a road map in an attempt to render the present claims obvious. The Appellants respectfully request reversal of the rejection of claims 1, 10, 11, 16, 23, 32, 33, and 38, over the combination of Kotchick et al. and Ogura et al., since the Examiner has not satisfied the initial burden of showing that one of ordinary skill in the art at the time of the invention would have been motivated to combine the teachings of such references in the manner suggested by the Examiner.

# B. The Examiner's Rejection of Claims 1, 10, 11, 16, 23, 32, 33, and 38 Under 35 U.S.C. § 103(a) Should Be Reversed Because the Combination of Kotchick et al. and Ogura et al. Does Not Teach or Suggest at Least One Element of Each of the Rejected Claims.

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In Re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (CCPA 1974). Even if Kotchick et al. and Ogura et al. could be properly combined, the combination of these references does not teach or suggest at least one element of each of Claims 1, 10, 11, 16, 23, 32, 33, and 38. Accordingly, the rejection of these claims under 35 U.S.C. § 103(a) is improper and should be reversed.

#### 1. <u>Claims 1, 10, 11, and 16.</u>

Independent Claim 1 recites "an interface configured to be removably coupled to a handheld computer, the interface being incorporated into the interface housing, which is part of the electronic module. The display has a separate display housing and a processor is coupled to a display and the display is smaller than a display of the handheld computer. Thus, claim 1 requires that an interface configured to be removably coupled to a handheld computer, the interface being incorporated into the interface housing.

There is no disclosure or teaching in either of Kotchick et al. or Ogura et al. of an interface configured to be removably coupled to a handheld computer, the interface being incorporated into the interface housing. The teaching of Ogura et al. teaches an interface that interfaces with a notebook computer and the display is not smaller than the display of the handheld computer. The interface of Kotchick et al. is a display interface and is not an interface for an electronic module. Further, the modules of Kotchick et al. are not electronic modules but rather are display modules. Kotchick et al. does not disclose, teach, or suggest that the electronic module is a stand alone electronic module, but rather is just a removable display. In fact, the Examiner points to paragraphs [0033] and [0037] of Kotchick et al. What is described at paragraphs [0037] is simply a removable display module that "need only be electronically connected in a suitable manner to a power source and any necessary electronics not already included in the module." Accordingly, Kotchick et al. teaches away from an electronic module having its own processor, memory, and power supply coupled to the processor as recited in Independent Claim 1. Thus, Independent Claim 1 is not obvious over Kotchick et al. and Ogura et al.

Accordingly, the combination of <u>Kotchick et al.</u> and <u>Ogura et al.</u> does not teach or suggest at least one limitation recited in Independent Claim 1. Reversal of the objection of Independent Claim 1 and its associated dependent claims is therefore respectfully requested.

#### 2. Claims 23, 32, 33, and 38.

With regard to Independent Claim 23, Independent Claim 23 recites "an interface configured to be removably coupled to the host handheld device, the interface being incorporated into the interface housing, the processor coupled to the interface and to the display; a memory coupled to the processor; and a power supply coupled to the processor," all incorporated into a portable electronic module for coupling to a host handheld device. Applicants respectfully submit that the portable electronic module recited in Independent Claim 23 includes a power supply, coupled to the processor and the display as configured for coupling to a host handheld device is not disclosed, taught, or suggested by any combination of Kotchick et al. and Ogura et al. Kotchick et al., as explained earlier tends to teach away from a display module having a power source in the display module 800 is fully functional for displaying images once suitably electronically connected to a power source in the requisite electronics. Therefore, what is described in Kotchick et al. is a display that needs to be coupled to a power source and the host device for it to work. However, if the display module of Kotchick et al. was combined with the handheld device of Ogura et al., all that is provided is a handheld device that is couplable to a laptop computer. However, as explained above, what Appellants have claimed is a portable electronic module for coupling to a host handheld device. A portable electronic module having all of the limitations provided in Claim 23 that is used for coupling to a host handheld device is not disclosed, taught, or suggested by any combination of Ogura et al. and Kotchick et al. Kotchick et al. only teaches a display that is powerable by a handheld device, not a electronic module that stands on its own. Further, Kotchick et al. just provides a replacement display for a handheld device, whereas what Applicants have claimed is a portable electronic module itself that does not replace the display of the host handheld device. Accordingly, for all of the reasons provided, the combination of Ogura et al. and Kotchick et al. does not teach or suggest at least one limitation recited in Independent Claim 23. Reversal of the rejection of Independent Claim 23 and its associated dependent claims is therefore respectfully requested.

#### **CONCLUSION**

- 1. In view of the foregoing, the Appellants submit that Claims 1-9, 12-15, 17-19, 22-31, 34-37, 39, and 40 are not properly rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,189,056 to Ogura et al. and are therefore patentable.
- 2. Claims 1, 10, 11, 16, 23, 32, 33, and 38 are not properly rejected under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2003/0016327 to Kotchick et al. in view of Ogura et al. and are therefore patentable.

Accordingly, Appellants respectfully request that the Board reverse all claim rejections and indicate that a notice of allowance respecting all pending claims should be issued.

Respectfully submitted,

Date September 17, 2004

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#### **APPENDIX - THE CLAIMS ON APPEAL**

- 1. An electronic module, comprising;
  - a display housing;
  - a display supported by the display housing;
  - an interface housing;
  - a processor coupled to the display;
  - a power supply coupled to the processor;
- an interface configured to be removably coupled to a handheld computer, the interface being incorporated into the interface housing; and,
  - a memory coupled to the processor,
  - wherein the display is smaller than a display of the handheld computer.
- 2. The electronic module for a handheld computer of claim 1, wherein the memory includes Secure Digital (SD) memory.
- 3. The electronic module for a handheld computer of claim 1, wherein the interface is configured to be coupled to a slot in a housing of the handheld computer.
- 4. The electronic module for a handheld computer of claim 1, wherein the interface is configured to exchange data with a host device through electrical interconnects.
- 5. The electronic module for a handheld computer of claim 1, wherein the interface is configured to exchange data with a host device through an optical data link.
- 6. The electronic module for a handheld computer of claim 1, wherein the power supply comprises an internal battery.
- 7. The electronic module for a handheld computer of claim 1, wherein the electronic module is configured to receive power from a host device through the interface.
- 8. The electronic module for a handheld computer of claim 1, wherein the interface housing is foldably connected to the display housing.

- 9. The electronic module for a handheld computer of claim 8, wherein the electronic module is configured to be received by a host device when the interface housing is folded behind the display housing.
- 10. The electronic module for a handheld computer of claim 8, wherein the host device is selected from the group consisting of: mobile telephone, game, toy, e-book, electronic projection device, camera, key fob or pendant, MP3 player, control for home, control for vehicle, remote control for entertainment system, digital sports assistant, pedometer, information technology equipment, and watch.
- 11. The electronic module for a handheld computer of claim 8, wherein the host device is a wearable device.
- 12. The electronic module for a handheld computer of claim 1, wherein the processor is selected from the group consisting of: ASIC, microcontroller, microprocessor.
- 13. The electronic module for a handheld computer of claim 12, further comprising at least one input/output device.
- 14. The electronic module for a handheld computer of claim 13, wherein the at least one input/output device is selected from the group consisting of: touch screens, buttons, dials, switches, and electro-audio transducers.
- 15. The electronic module for a handheld computer of claim 6, wherein the electronic module operates to display information when not coupled to a host device.
- 16. The electronic module for a handheld computer of claim 1, wherein the electronic module is configured to be coupled to a host device, the host device being selected from the group consisting of: mobile telephone, game, toy, e-book, electronic projection device, camera, key fob or pendant, MP3 player, control for home, control for vehicle, remote control for entertainment system, digital sports assistant, pedometer, information technology equipment, and watch.
- 17. The electronic module for a handheld computer of claim 1, further comprising a display controller for controlling the display.

- 18. The electronic module for a handheld computer of claim 1, wherein the memory is configured to store and retain data customized to the user.
  - 19. An accessory module for a handheld electronic device comprising: an accessory housing;
    - a processor supported by the accessory housing;
- an interface for making electrical connection between the processor and a host device; and,

an interface housing for supporting the interface,

wherein, the interface housing is hinged to the accessory housing such that the interface housing can fold behind the accessory housing, the interface housing can unfold to extend for insertion into an interface slot in the handheld electronic device, and the interface can be used to couple to the host device when in the folded position.

- 20. The accessory module for the handheld electronic device of claim 19, wherein the accessory module is configured when folded to be received within a cavity provided within a host device, the host device being selected from the group consisting of: mobile telephone, game, toy, e-book, electronic projection device, camera, key fob or pendant, MP3 player, control for home, control for vehicle, remote control for entertainment system, digital sports assistant, pedometer, information technology equipment, and watch.
- 21. The accessory module for the handheld electronic device of claim 19, wherein the hinge includes a plurality of detents.
- 22. The accessory module for the handheld electronic device of claim 19, wherein the interface housing is configured to fit a secure digital (SD) slot.

- 23. A portable electronic module for coupling to a host handheld device, comprising:
  - a display housing;
  - a display coupled to the display housing;
  - an interface housing;
- an interface configured to be removably coupled to the host handheld device, the interface being incorporated into the interface housing;
  - a processor coupled to the interface and the display;
  - a memory coupled to the processor; and
  - a power supply coupled to the processor.
- 24. The portable electronic module of claim 23, wherein the memory includes Secure Digital (SD) memory.
- 25. The portable electronic module of claim 23, wherein the interface is configured to be coupled to a slot in a housing of the host handheld device.
- 26. The portable electronic module of claim 23, wherein the interface is configured to exchange data with the host handheld device through electrical interconnects.
- 27. The portable electronic module of claim 23, wherein the interface is configured to exchange data with the host handheld device through an optical data link.
- 28. The portable electronic module of claim 23, wherein the power supply comprises an internal battery.
- 29. The portable electronic module of claim 23, wherein the electronic module is configured to receive power from the host handheld device through the interface.
- 30. The portable electronic module of claim 23, wherein the interface housing is foldably connected to the display housing.

- 31. The portable electronic module of claim 30, wherein the electronic module is configured to be received by the host handheld device when the interface housing is folded behind the display housing.
- 32. The portable electronic module of claim 30, wherein the handheld host device is selected from the group consisting of: mobile telephone, game, toy, e-book, electronic projection device, camera, key fob or pendant, MP3 player, control for home, control for vehicle, remote control for entertainment system, digital sports assistant, pedometer, information technology equipment, and watch.
- 33. The portable electronic module of claim 30, wherein the host handheld device is a wearable device.
- 34. The portable electronic module of claim 23, wherein the processor comprises a processing circuit selected from the group consisting of: ASIC, microcontroller, microprocessor.
- 35. The portable electronic module of claim 34, further comprising at least one input/output device.
- 36. The portable electronic display module of claim 35, wherein the at least one input/output device is selected from the group consisting of: touch screens, buttons, dials, switches, and electro-audio transducers.
- 37. The portable electronic display of claim 28, wherein the display module operates to display information when not coupled to the host handheld device.
- 38. The portable electronic module of claim 23, wherein the electronic module is configured to be coupled to the host handheld device, the host handheld device being selected from the group consisting of: mobile telephone, game, toy, ebook, electronic projection device, camera, key fob/pendant, MP3 player, control for home, control for vehicle, remote control for entertainment system, digital sports assistant, pedometer, information technology equipment, and watch.
- 39. The portable electronic module of claim 23, further comprising a display controller for controlling the display.

40. The portable electronic module of claim 23, wherein the memory is configured to store and retain data customized to the user.

#### **Evidence Appendix**

Attached Documents:

• Copy of Supplemental IDS with cited references filed on February 17, 2004.